

PATENTS
Attorney Docket No. VAO-001.02

REMARKS

Applicants have amended claim 16 as a matter of grammatical form, not as a matter of substance; the amendment adds no new matter to the claim. Claim 16 now reads as the Examiner seems to have interpreted it according to the Office Action.

Claims 1-20 are pending in the current application.

Claim Rejections - 35 U.S.C. § 103(a)

The Examiner rejected claims 1, 3, and 5-14 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,122,647 to Horowitz ("Horowitz") in further view of U.S. Patent No. 6,279,018 to Kudrolli ("Kudrolli"). The Examiner further rejected claim 2 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz and Kudrolli in further view of U.S. Patent No. 6,137,488 to Kraft ("Kraft"). The Examiner further rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz and Kudrolli in further view of U.S. Patent No. 6,662,342 to Marcy ("Marcy").

Applicants' independent claim 1 is not obvious in light of Horowitz in further view of Kudrolli. Applicants' independent claim 1 requires, among other things, that at least one object memory be provided based on at least one of a local configuration and a global configuration. The Examiner cited to col. 7, lines 66-67 of Horowitz as disclosing "providing at least one object in [sic] memory based on a global configuration." However, the phrase in claim 1 does not include the word "in". Rather, the phrase is "object memory", which the specification describes on page 23, lines 6-22.

PATENTS

Attorney Docket No. VAO-001.02

The two cited lines of Horowitz state: "The tagging module 120 determines the topics in the knowledge base 130 that are about the selected portion 304." Horowitz describes a tagging module as being responsible for analyzing a selected portion of a document, identifying a set of terms and topics that are relevant to the selected portion or about it, and generating tags in the document that associate the terms and topics; *see* col. 6, lines 49-53. Horowitz goes on to describe a knowledge base as a persistent data store used to store both topic information and a number of topics linked together in various hierarchal interconnected graphs by relations; *see* col. 5, lines 49-50 and 65-67. The selected portion, according to Horowitz, is the part of a source document selected by a user that is analyzed by the tagging module; *see* col 7, lines 59-63.

In citing to col. 7, lines 66-67 of Horowitz, the Examiner is stating that one of the elements therein is the at least one object "in" memory required by claim 1, while another is the global configuration required by claim 1. This reasoning, based on the extra word "in", is incorrect. Regardless of the comparison used or intended by the Examiner, Horowitz does not teach or suggest that any of the elements indicated above (the knowledge base, a topic within it, the tagging module, or the selected portion of a document) are *provided based on* at least one of the other elements, as required by Applicants' independent claim 1. Instead, Horowitz teaches that the user selected portion of the document is *provided to* the tagging module, which itself is coupled to the knowledge base; *see* col. 7, lines 63-65. When the selected portion of the document is provided to the tagging module, according to Horowitz, this is done *as a matter of course*, *see* Fig. 6 of Horowitz, not *based on* at least one of a local configuration and a global configuration, as required by Applicants' claim 1.

PATENTS
Attorney Docket No. VAO-001.02

Thus, Horowitz does not teach or suggest that an object memory be provided based on at least one of a local configuration and a global configuration, as required by Applicants' independent claim 1. Further, Kudrolli also does not teach or suggest that an object memory be provided based on at least one of a local configuration and a global configuration. Therefore, for these reasons among others, Applicants' independent claim 1 is patentable over Horowitz in further view of Kudrolli. Further, as Applicants' dependent claims 2-14 all depend from allowable independent claim 1, these dependent claims are also allowable.

The Examiner also rejected claims 15-17 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz in further view of U.S. Patent No. 6,088,717 to Reed ("Reed"). The Examiner further rejected claim 18 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz and Reed in further view of U.S. Patent No. 5,884,308 to Vanechanos, Jr. ("Vanechanos"). The Examiner further rejected claim 19 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz and Reed in further view of U.S. Patent No. 6,356,633 to Armstrong ("Armstrong"). Finally, the Examiner also rejected claim 20 under 35 U.S.C. § 103(a) as being unpatentable over Horowitz and Reed in further view of Marcy.

Applicants' independent claim 15 is patentable in light of Horowitz in further view of Reed. Applicants' independent claim 15 includes the same elements of claim 1 described above, namely that at least one object memory be provided based on at least one of a local configuration and a global configuration. Thus, for the reasons stated above with regards to Applicants' independent claim 1, independent claim 15 is also not taught or suggested by Horowitz. (Please note that the Examiner's discussion of claim 15, similar to the

PATENTS
Attorney Docket No. VAO-001.02

Examiner's discussion of claim 1, includes the extra word "in" as part of the text of the claim.) Further, Reed also does not teach or suggest that an object memory be provided based on at least one of a local configuration and a global configuration. Thus, Applicants' independent claim 15 is patentable over Horowitz in further view of Reed. Further, as Applicants' dependent claims 16-20 all depend from allowable independent claim 15, these dependent claims are also allowable.

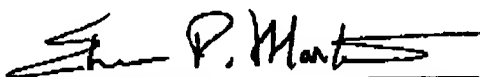
CONCLUSION

Applicants believe this Amendment and Response to be fully responsive to the present Office Action. Thus, based on the foregoing Remarks, Applicants respectfully submit that this application is in condition for allowance. Accordingly, Applicants requests allowance of the application.

Applicants invite the Examiner to contact the Applicants' undersigned Attorney if any issues are deemed to remain prior to allowance.

Respectfully submitted,

Date: December 17, 2004
Customer No: 25181
Patent Group
Foley Hoag, LLP
155 Seaport Blvd.
Boston, MA 02210-2600


Shaun P. Montana, Reg. No. 54,320
Attorney for Applicants
Tel. No. (617) 832-1245
Fax. No. (617) 832-7000